

Emily Taylor

From: Hugh Eastwood <heastwood@eastwoodlawstl.com>
Sent: Wednesday, December 13, 2023 1:50 PM
To: Eric Daigle
Cc: Sandos, Sunny; Alexis Tahinci; Lisa May; Tom Garland; Emily Taylor; rebecca@courtrepreneur.net
Subject: Re: Deposition subpoena

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Eric,

Thanks for your response, and for accepting service.

Yes, counsel in the Dahl case have been diligently working through discovery issues as to what is in the City file as to your engagement and report. We have agreed as to the underlying sex case files to cabin our request to the Sean Williams complainants.

We view your file differently than what may be in the City Attorney's file. Can you pls let us know more about your issue with the subpoena request for your file. For example, is it based on privilege or work product, or are there particular logistical concerns as to producing aspects of your file and communications? Since the City (through Sunny) holds any privilege, counsel in the Dahl case would like to understand better your issue to attempt to resolve well ahead of your depo and the Christmas holiday. That is because we have already engaged in some motion practice and discussions about these issues.

Thanks so much,

Hugh and Alexis

On Mon, Dec 11, 2023 at 7:41 PM Eric Daigle <eric.daigle@daiglelawgroup.com> wrote:

Attorney Eastwood,

While I have no issue accepting the subpoena, I do have an issue with the production request. I am advised that Attorney Eric Herrin is working with you regarding the production of certain file materials. I am advised that Johnson City Counsel will be producing the file materials related to Sean Williams only.

Thank you.

Eric

Eric

From: Hugh Eastwood <heastwood@eastwoodlawstl.com>
Sent: Monday, December 11, 2023 12:49 PM
To: Eric Daigle <eric.daigle@daiglelawgroup.com>
Cc: Alexis Tahinci <alexis@tahincilaw.com>; Lisa May <lisa@hbm-lawfirm.com>; Tom Garland <tgarland@milligancoleman.com>; Emily Taylor (etaylor@watsonroach.com) <etaylor@watsonroach.com>; rebecca@courtrep.net
Subject: Deposition subpoena

[EXTERNAL SENDER]

Dear Mr. Daigle:

Attached pls find a deposition testimony subpoena for what we are told is an agreed-upon date and time of Thursday, December 28, 2023 at 9:00 a.m. Eastern.

Please let us know if you will accept service, or if we need to have you served at your offices in Connecticut.

Our Court Reporter of record in this case, Rebecca Overbey, will circulate a Zoom link for the deposition.

Thank you,

Hugh Eastwood and Alexis Tahinci

Counsel for plaintiff Kateri L. Dahl

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